

## REMARKS

1. Claims 1-2, 7-19 were rejected under 35 U.S.C. 103(a) over “Modality Conversion in Content Adaptation for Universal Multimedia Access” (“MCAA”) in view of Tso et al. (US 6,421,733 B1).

2. Claim 18 is re-written as independent to incorporate the language of claim 13. Claim 18 is supported by the original disclosure as follows. The content value specifications read on the content value curves  $VM_{ij}$  of Fig. 2 (specification, page 11, lines 2-10) or on their scaled versions  $W_{ij}VM_{ij}$ . The quality specifications recited in the last paragraph of claim 18 read on the quality curves  $VM_{ij}^k$  (page 12 line 4, equation (2); Figs. 4a, 4b) or their scaled versions  $z_k \cdot VM_{ij}^k$ .

Claim 18 recites that each quality specification provides “for each resource value ... a content value based on the respective quality”. This is supported by the specification, page 11 line 23 through 12 line 4.

Claim 18 is not limited to the embodiments discussed herein.

3. Claim 18 last paragraph recites that at least one content value specification is obtained by “combining quality specifications associated with respective different qualities”. The office action page 11 states that this is taught by “MCAA page 435, column 2, lines 35-41, equation (1), the value of the modality is depending on capacity, human perception, and resource values”. There is no indication however that capacity or human perception meet the definition of a quality specification of claim 18, i.e. “providing, for each resource value in the associated set, a content value”.

More particularly, MCAA equation (1) indicates that the content value  $V_i$  depends on resource  $R_i$ , modality capability  $M$ , and user preference  $P_i$ . There is no indication that modality capability  $M$  or user preference  $P_i$  meet the definition of a quality specification of claim 18. In particular, “modality capability” is “modality capability of terminal” as recited on MCAA page 435, right column, first paragraph. Thus, the modality capability  $M$  does not provide a content value for a “resource value in the associated set” as recited in claim 18.

Likewise, MCAA does not teach or suggest that  $P_i$  meets the definition of a quality specification of claim 18.

4. Claim 19 depends from claim 18. The examiner's interpretation of claim 19 is inconsistent with the interpretation of claim 13 whose language is incorporated into claim 18 and hence into claim 19. More particularly, in discussing claim 13, the office action page 8 refers to MCAA's page 436, Fig. 2. MCAA's Fig. 2 is similar to the applicant's Fig. 2, and MCAA's definition of the content value  $V_i$  in terms of  $VM_{ij}$  on page 436 in equation (3) is similar to the applicant's definition of  $V_i$  on page 11 in equation (1). Thus, the examiner apparently associates the applicant's content value specifications  $VM_{ij}$  with MCAA's  $VM_{ij}$ .

However, claim 19 recites that at least one content value specification is obtained from a sum of scaled quality specifications. This would mean that in MCAA, at least one  $VM_{ij}$  must be obtained from a sum of scaled quality specifications.

Instead, in discussing claim 19, the office action (page 11) refers to "MCAA, page 435, column 2, lines 35-41, the value of the modality is a sum of different value  $R_i$  of the resource constraint". However, MCAA's page 435 column 2 does not teach or suggest that  $VM_{ij}$  (or its scaled value) is obtained as a sum of  $R_i$ . MCAA recites the sums  $\sum_i V_i$  and  $\sum_i R_i$ , none of which represents  $VM_{ij}$ . It is respectfully submitted that in order to meet the language of claim 19 consistently with the examiner's interpretation of claim 13, MCAA has to teach that  $VM_{ij}$  is obtained from a sum of scaled quality specifications defined in claim 18. It is insufficient for MCAA simply to teach a sum of something.

5. Claims 1-2, 7-17 depend from a new claim 20 discussed below.

6. Claims 3-6 were rejected under 35 U.S.C. 103(a) over MCAA, Tso and Adapting Multimedia Internet Content for Universal Access ("AMICUA").

7. Claim 6 is re-written as independent. Claim 6 recites in the last paragraph:

... each of the content value curves is obtained by combining content value curves that are measured according to two or more different qualities.

Thus, according to claim 6, **one** content value curve is obtained by **combining** content value curves that are measured according to different qualities.

The office action page 14 states that this feature is taught by AMICUA page 20, section 4.1, fig. 3 showing “a table where values are obtained with different function relationships with the resource in bits”. This table does not teach however that these function relationships are **combined** to obtain **one** content value curve as recited in claim 6.

8. Claims 3-5 depend from a new claim 20. Claim 20 recites, “for at least one modality ..., the associated content value specification depends on each of a plurality of quality specifications”. Claim 20 is believed to be allowable for reasons similar to the reasons given above for claim 6.

9. Claims 21-24 depend from claim 20. In addition, claim 22 is believed to be allowable for reasons similar to the reasons given above for claim 19 (“sum of the quality specifications scaled”).

10. Claims 25-26 depend from claim 20, and are supported by the specification page 8 lines 8-11 and page 12 line 11.

11. Claim 31 includes language similar to the language of the original claim 1, but also recites, “the quality curves and the scale factors define a content value curve for the modality of the media resource”. Claim 31 is believed to be allowable for reasons similar to the reasons given above for claim 6.

Claim 32 is supported by the original claim 2.

Claim 33 is supported by the same passages of the original disclosure as discussed above in connection with claims 18-19.

Claims 33-35 are supported by the original claims 4-6.

Claim 36 is believed to be allowable for reasons similar to the reasons given above for claim 31.

Claims 37-41 are supported by the same passages of the original disclosure as the respective claims 33-35.

12. If a fee is required for this submission, please charge the fee or any underpayment thereof, or credit any overpayment, to deposit account 08-1394.

Any questions regarding this case can be addressed to the undersigned at the telephone number below.

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Michael Shenker 28 July '09  
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